

1 WRIGHT, FINLAY & ZAK, LLP
2 Darren T. Brenner, Esq.
3 Nevada Bar No. 8386
4 Lindsay D. Dragon, Esq.
5 Nevada Bar No. 13474
6 7785 W. Sahara Ave., Suite 200
7 Las Vegas, NV 89117
8 (702) 637-2345; Fax: (702) 946-1345
9 dbrenner@wrightlegal.net
10 ldragon@wrightlegal.net
11 *Attorneys for Plaintiff, Bank of America, N.A.*

8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

10 BANK OF AMERICA, N.A.,

11 Plaintiff,

12 vs.

13 OLD REPUBLIC NATIONAL TITLE
14 INSURANCE COMPANY; OLD REPUBLIC
15 TITLE COMPANY OF NEVADA; DOES I
16 through X; and ROES XI through XX,

Defendants.

Case No.: 2:21-cv-00454-GMN-EJY

**STIPULATION AND ORDER TO EXTEND
DEADLINE TO FILE JOINT STATUS
REPORT**

[First Request]

17 Plaintiff, Bank of America, N.A. (“BANA”) and Defendants, Old Republic National Title
18 Insurance Company and Old Republic Title Company of Nevada (“Defendants”, and with BANA, the
19 “Parties”), by and through their undersigned counsel, stipulate and agree as follows:

20 1. On March 18, 2021, BANA filed its Complaint in the Eighth Judicial District Court, Case
21 No. A-21-831366-C [ECF No. 1-1];

22 2. On March 18, 2021, Old Republic National Title Insurance Company filed a Petition for
23 Removal to this Court [ECF No. 1];

24 3. Thereafter, on May 11, 2021, the Court entered an Order granting the Parties’ stipulation
25 to stay the case pending the Ninth Circuit appeal in *Wells Fargo Bank, N.A. v. Fidelity Nat’l Title Ins.*
26 *Co.*, Case No, 19-7332 (“*Wells Fargo II Appeal*”) [ECF No. 16]. The *Wells Fargo II Appeal* resolved on
27 November 5, 2021.
28

4. On December 5, 2022, the Court entered a Minute Order requesting that the Parties by a Joint Status Report by January 5, 2023, explaining why this case should remain stayed. [ECF No. 20].

5. Counsel for BANA needs additional time to confer with its client regarding the stay in light of the recent holidays. The Parties hereby stipulate to an additional thirty (30) days, through and including February 6, 2023, to file their Joint Status Report.

6. Counsel for Defendants does not oppose the requested extension;

7. This is the first request for an extension which is made in good faith and not for purposes of delay.

IT IS SO STIPULATED.

DATED this 5th day of January, 2023.

WRIGHT, FINLAY & ZAK, LLP

/s/ Lindsay D. Dragon, Esq.

Lindsay D. Dragon, Esq.
Nevada Bar No. 13474
7785 W. Sahara Ave., Suite 200
Las Vegas, NV 89117
Attorneys for Plaintiff, Bank of America, N.A.

DATED this 5th day of January, 2023.

EARLY SULLIVAN WRIGHT
GIZER & McRAE LLP

/s/ Sophia S. Lau, Esq.

Sophia S. Lau, Esq.
Nevada Bar No. 13365
8716 Spanish Ridge Avenue, Suite 105
Las Vegas, NV 89148
Attorneys for Defendants, Old Republic National Title Insurance Company and Old Republic Title Company of Nevada

Order

IT IS SO ORDERED.

Dated this 5 day of January, 2023


Gloria M. Navarro, District Judge
UNITED STATES DISTRICT COURT